

United States District Court for
Southern District of New York

Civil No# _____

Crim. No# 198 CR-01023-LAK-9

Ahmed Ghailani

Defendant-Petitioner

- V -

MEMO ENDORSED

United States of America

Plaintiff-Respondent

(Pro se) Motion For Leave Requesting To File An
Additional Claim To Petitioner's June 23, 2020, Filed
Rule 60 Motion As A Precaution Under Davis 139
S.Ct. 2319 (June 24, 2019)

Petitioner moves this court to take judicial notice that
this morning he handled the officer working the prisoners living
unit A Rule 60 Motion under two issues: (1) Jurisdictional De-
fect, and (2) Davis supra. However, Petitioner just mentioned
Conspiracy was no longer a violent crime, but he also will raised
that the "statute" Petitioner was "Charged, Indicted & Convicted"
is Constitutionally vague. Petitioner felt that just raising the Davis,
is was enough to cover every issue under Davis. However, as a
precaution Petitioner is specifically raising here this other issue
because the Davis issue ends tomorrow. so he still on time.

Petitioner further filed this morning an accompanied
Motion for a sixty (60) Days Extension OF Time To File a Rule 15
(a) or (e) Motion to "Clarify, Amend or Supplement" his issues & arguments
he raised in his Rule 60 motion. He will submit this issue & argument as well.

Date: June 23, 2020

Respectfully Submitted,
/s/ A. Ghailani
Ahmed Ghailani's Signature.

Certificate of Service

I, Ahmed Ghailani, States that on the 23rd, day of June, year 2020, he mailed a copy of the foregoing Motion to the name & address below:

U.S. Dist. Attorney's Office,
One St. Andrew's Plaza,
New York, NY 10007

Respectfully Submitted,

/s/

A. Ghailani
Ahmed Ghailani's Signature

Devoid. These are not proper
subjects for judicial notice

SO ORDERED

L. Kaplan
LEWIS A. KAPLAN, USDJ

12/2/2020